



*United States Attorney
Southern District of New York*

*The Silvio J. Mollo Building
One Saint Andrew's Plaza
New York, New York 10007*

February 26, 2021

BY ECF

The Honorable Paul G. Gardephe
United States District Court
Southern District of New York
40 Foley Square
New York, New York 10007

Memo Endorsed: The parties will file a proposed briefing schedule by March 5, 2021.

SO ORDERED.

Paul G. Gardephe
United States District Judge

Dated: March 1, 2021

Re: *United States v. Alexei Saab*, 19 Cr. 676 (PGG)

Dear Judge Gardephe:

The Government writes in response to the defense's February 25, 2021 letter motion. (*See* Dkt. 71.) On February 22, 2021, the defense filed a Motion to Dismiss Counts Seven, Eight, and/or Nine of the Indictment. (*See* Dkts. 67-69.) Thereafter, the Court ordered the Government to respond to those motions on or before March 16, 2021. By virtue of their recent letter motion, however, the defense seeks leave to file a third round of motions.¹ Thus, the Government respectfully requests that the Court adjourn the previously scheduled date for the Government response pending the filing of the defense's motions, so that the Government may respond to all of the motions in a single comprehensive filing. Should the Court grant the Government's request, the Government will work with the defense to propose an agreed-upon briefing schedule for the Court's consideration.

Respectfully submitted,

AUDREY STRAUSS
United States Attorney

By: _____/s/_____
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cc: Defense Counsel (by ECF)

¹ The defendant's earlier motions—seeking a change of venue and the suppression of certain statements and evidence—are briefed and remain pending. (*See* Dkts. 26-32.)